## REMARKS/ARGUMENTS

Reconsideration and withdrawal of the rejections of the application are respectfully requested in view of the amendments and remarks herewith, which place the application into condition for allowance. The present amendment is being made to facilitate prosecution of the application.

## I. STATUS OF THE CLAIMS AND FORMAL MATTERS

Claims 15 is currently pending. Claims 1-14 and 16-28 have been canceled without prejudice or disclaimer of subject matter. No new matter has been introduced. Support for this amendment is provided throughout the Specification. Changes to the claims are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

The Office Action indicated that the references were in a foreign language.

Applicant submits herewith a copy of an International Search Report, which provides an identifier regarding the status of the foreign language documents. Applicants submit that this is in compliance with MPEP 609.04(a).

Applicant submits herewith a Substitute Specification (both a "track-changes" version and a "clean" version), thereby obviating the issues raised by the Office Action with respect to the Specification. No new matter has been introduced.

Claim 15 has been amended, thereby obviating the objections, 112 and 101 issues.

The "means-plus-function" language is supported by the structure described on pages 26-30, 3436 and Figures 1, 2, 13, 18 and 19 of the Specification.

## II. REJECTIONS UNDER 35 U.S.C. §102(b)

Claim 15 was rejected under 35 U.S.C. §102(b) as allegedly anticipated by Yuzuru Fujiwara "Learning/Thinking Mechanism And Its Applications To Hyper Brain Computers (hereinafter, merely "Fujiwara").

Claim 15 recites, inter alia:

"...wherein if it is determined by the verified result of said verifying means that said inquiry or request are completely coincident with said knowledge base, then understanding of such coincidence is transmitted to a central unit,

if it is determined by the verified result of said verifying means that said inquiry or request are partly coincident with said knowledge base, then said knowledge based and said unit in which said relating node is stored are verified and said information generating means supplements insufficient information and generates information so that knowledge structured by said node and said link based on said semantic relation has new semantic content and new semantic relation. (emphasis added)

Applicant submits that the Fujiwara reference, which is a paper authored by the inventor of the present invention, does not anticipate claim 15. Indeed, Applicant respectfully traverses the rejection of claim 15 in view of this reference on the grounds that the Office Action has failed to make a *prima facie* case on unpatentability.

The Office Action relies on pages 20-21 of the Fujiwara reference to reject the above-cited portions of claim 15; however, pages 20-21 do not disclose that if it is determined by the verified result of said verifying means that said inquiry or request are completely coincident with said knowledge base, then understanding of such coincidence is transmitted to a central unit. While Fujiwara describes a relational type database, there is no disclosure of complete

coincident with the knowledge base resulting in a transmission to a central unit. Therefore, claim 15 is patentable.

Furthermore, Fujiwara also does not address the issue of part coincident resulting in supplementing insufficient information and generating information so that knowledge structured by the node and the link has new semantic content and new semantic relation. These features were not the subject of disclosure of the Fujiwara reference; but are recited in claim 15. Thus, the Fujiwara reference is silent regarding the situation that, "if it is determined by the verified result of said verifying means that said inquiry or request are partly coincident with said knowledge base, then said knowledge based and said unit in which said relating node is stored are verified and said information generating means supplements insufficient information and generates information so that knowledge structured by said node and said link based on said semantic relation has new semantic content and new semantic relation", as recited in claim 15.

Therefore, Applicant respectfully submits that claim 15 is patentable.

## CONCLUSION

In the event the Examiner disagrees with any of the statements appearing above with respect to the disclosures in the cited reference, or references, it is respectfully requested that the Examiner specifically indicate the portion, or portions, of the reference, or references, providing the basis for a contrary view.

Please charge any additional fees that may be needed, and credit any overpayment, to our Deposit Account No. 50-0320.

In view of the foregoing amendments and remarks, it is believed that claim 15 is patentable and Applicant respectfully requests early passage to issue of the present application.

Respectfully submitted,

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